

Specific Comments on 7/24/98 Drinking Water Draft

A. Page 7 - What is the Nature of the Occurrence of Contaminants Affecting Drinking Water?

We believe that the statement that "pathogens largely come from sewage treatment plants, urban stormwater runoff, ..." is unsupported by any monitoring information in the document. We are not aware of the availability of such data for stormwater.

B. Page 10 - Wastewater Treatment Plants

There is no substantiation that "...permitting activities for these plants do not fully address drinking water contaminant loadings." If parties object to a NPDES permit adopted by a Regional Board they may petition the matter to the State Water Resources Control Board. We are not aware of any such petitions.

C. Page 12 - Water Quality at Specific Points of Concern

Add Fairbairn Water Treatment Plant under City of Sacramento.

D. Page 22 - Suggested Core Actions for Drinking Water Quality Improvements

The document states that "of primary importance is reduction and maintenance of pathogen loading in source waters to less than one *Cryptosporidium* oocyst or *Giardia* cyst/100L." We support the regulations that state that source water quality meeting those levels is considered uncontaminated. Our difficulties arise at having a quantitative goal which is not measurable and possibly not realistic. We recommend re-wording of this statement, to provide a more reasonable focus on source water protection regarding reduction of risk from pathogens in the watershed. The following re-wording is suggested:

"An important consideration is reducing the risk from pathogen loading in source waters by supporting monitoring and watershed management efforts. This will enhance...."

E. Page 24 - Actions to Improve Water Quality in the American and Sacramento Rivers, #6. Further determine sources of contaminants of concern to Watershed

1. Point sources are currently not impacting drinking water sources. If it's desired to obtain additional monitoring data then CALFED should support the SRWP monitoring efforts.

2. The statement in the second paragraph, "as the population of the watershed grows, there will be a need to identify potential mitigation measures for increased wastewater and urban runoff discharges that are high in TDS", should be eliminated. The need for actions to improve TDS in the American and Sacramento Rivers has not been demonstrated. On page 8 of the document, under the section entitled "Sacramento River", it is stated that the quality of the source water is considered high drinking water quality.

F. Page 32 - Bay Delta Regional Opportunities to Improve Drinking Water Quality, #3, Reconsider Wastewater and Stormwater Permits

Point sources are currently not impacting drinking water sources. The Report shows no evidence that expansion of the wastewater or water treatment plants mentioned are a threat to drinking water sources - either existing or proposed. There is no basis for statement that "...the CEQA process and development of NPDES permits do not adequately address impacts for drinking water."

More specifically, regarding the proposed expansion of the Fairbairn Water Treatment Plant, we do not agree that the expansion would result "potential problems for adverse loadings". Therefore, we believe that the reference to this facility should be removed from this section.